

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

**RODI MARINE, LLC and
BOAT SERVICES OF
GALVESTON, INC.**
Plaintiffs,

VS.

**LIGHTHOUSE MARINE, LLC and
PENINSULA MARINE, INC.**
Defendants.

S S S S S S S S

CIVIL ACTION NO. 3:22-cv-00403

**MAGISTRATE JUDGE
HON. ANDREW M. EDISON**

**DISCLOSURE OF EXPERTS OF DEFENDANTS, LIGHTHOUSE MARINE, LLC
AND PENINSULA MARINE, INC. PURSUANT TO FED.R. CIV. P. 26(a)(2)(B)**

Defendants, Lighthouse Marine, LLC and Peninsula Marine, Inc. (“hereinafter referred to as “Defendants”), through its undersigned counsel, hereby disclose the following expert witnesses in accordance with the applicable Federal Rules of Civil Procedure and Federal Rules of Evidence and states that the following persons may be called to provide expert testimony or present evidence at the trial of this case:

I. DEFENDANTS' RETAINED EXPERTS

A. Harry L. Stark, USCG (Ret.), NAMS-CMS
Diers and Stark, Inc.
211S. Highway 69
Nederland, Texas 77627
409/727-1607

Valuation of the M/S MS MONICA

For all topics/opinions, see Expert Report with exhibits previously provided with C.V., rates and testimonial history.

In addition, this expert will provide rebuttal testimony on any opinions regarding valuation or other issues related to the M/V MS MONICA offered by other experts.

B. MP Singh

Senior Marine Engineer

3D Marine – a Brookes Bell Company

12411 Donna Dr., Houston, Texas 77067

281-444-9495

Shipyard operations/ safety / liability issues

For all topics/opinions, see Expert Report with exhibits previously provided with C.V., rates and testimonial history.

In addition, this expert will provide rebuttal testimony on any opinions regarding shipyard operations/safety/ liability issues or related issues offered by other experts.

C. Joseph Lombardi

Ocean Marine Technical services, LLC

2600 South Shore Blvd. #300

League City, Texas 77573

508/958-1299

Valuation of the S/V NINO

For all topics/opinions, see Expert Report with exhibits previously provided with C.V., rates and testimonial history.

In addition, this expert will provide rebuttal testimony on any opinions regarding valuation, condition, reasonable repairability and/or related issues concerning the S/V NINO offered by other experts.

D. Gregory R. Schuelke

GRS Analytics, LLC

11757 Katy Freeway

Suite 1300

Houston, Texas 77079

832/600-4491

Evaluation and analysis of Rodi Marine , LLC alleged loss of use / profits claim

For all topics/opinions, see Expert Report with exhibits previously produced with C.V., rates and testimonial history.

In addition, this expert will provide rebuttal testimony on any opinions regarding Rodi loss of use / profits claims offered by other experts, including the speculative nature of the claims, reasonable periods of time for consideration of such damages under the facts and circumstance of this case and related issues.

II.
NON-RETAINED EXPERTS

A. Wayne Mouton

Lighthouse Marine, LLC
1608 Rankin Avenue
Port Bolivar, Texas 77650
409/684-6042

Overall knowledge of shipyard operations, shipyard layout and capabilities, security, fire response capabilities, authenticity of shipyard surveillance footage of the arson incident, employee/contractor/borrowed servant status, customer relations, fire notification and response, post-incident investigation, vessel conditions and valuations and related issues.

B. Arthur Guidry

Lighthouse Marine, LLC
1608 Rankin Avenue
Port Bolivar, Texas 77650
409/684-6042

Overall knowledge of shipyard operations, shipyard layout, security, fire response capabilities, customer relations, employee/contractor/ borrowed servant status, work conducted and not conducted by Lighthouse Marine, LLC and/or third party contractors on the M/V MS MONICA and S/V NINO while at the shipyard, notification of fire in question, authenticity of the shipyard surveillance footage of the arson incident, fire response, post-incident investigation, vessel conditions and valuations and related issues.

C. Wayne Mouton

Peninsula Marine, Inc.
707 Eagle Road
Anahuac, Texas 409-252-3210

Non-involvement of this entity with the incident in suit, employee/contractor/ borrowed servant status of key personnel and related issues

D. Jamie Blackburn

Lighthouse Marine, LLC
1608 Rankin Avenue
Port Bolivar, Texas 77650
409/684-6042

General premises operations, customer relations, scheduling, customer insurance provision, pre-and post-incident contact with representatives of Plaintiffs, Intervenor, other customers, fire and law enforcement officials, wreck/debris removal issues, authenticity of the shipyard surveillance footage of the arson incident and related topics.

E. Galveston County Sheriff's Department

601 54th Street

Galveston, Texas 77551

409/766-2300

Criminal investigators Smitty Hill (or Hall), Garret Foskit and John E. Fernandez

Supervisors C.D. Dunn and K.B Miller

Assisting Officers R.H. Dodd, E. Reyes and J.W. Newkirk

Fire Investigator John Venzke

Brent Haynes

Reports previously produced as LM00045-LM00061 through correspondence from Ms. Bridgette A. Begle of Olson & Olson LLP

One or more of these individuals are expected to offer testimony under Federal Rule of Evidence 702, 703 and/or 705 on topics including investigation of the cause and origin of the fire at issue and perpetrators, non-involvement of the Defendants in same, lack of any history of criminal activity (including arson) in and around the Lighthouse Marine facility and any other topics covered in any pretrial deposition taken of one or more of these individuals.

F. Santa Fe Fire & Rescue

13112 Highway 6

Santa Fe, Texas 77510

409/925-7331

Deputy Chief Christopher Anderson

Report previously produced as LM00043-LM00044

This individual or his designee is expected to offer testimony under Federal Rule of Evidence 702, 703 and/or 705 on topics including fire response, post-incident investigation on cause and origin and perpetrators, shipyard setup and customary capabilities, lack of any history of fires (including arson) in and around the Lighthouse Marine facility and any other topics covered in any pretrial deposition taken of this individual or his designee.

G. Port Bolivar Volunteer Fire Department

1806 Broadway Ave.

Port Bolivar, Texas 77650

409/684-1984

Chief Malcolm M. Comeaux

This individual or his designee is expected to offer testimony under Federal Rule of Evidence 702, 703 and/or 705 on topics including fire response, post-incident investigation on cause and origin and perpetrators, shipyard setup and customary capabilities, lack of any history of any fires (including arson) in and around the Lighthouse Marine facility and any other topics covered in any pretrial deposition taken of this individual or his designee.

- H. Crystal Beach Fire & Rescue
930 Noble Carl Dr.
Crystal Beach, Texas 77650
409/684-6311

A representative of this entity is expected to offer testimony under Federal Rule 702, 703 and/or 705 on topics including fire response, post-incident investigation on cause and origin and perpetrators, shipyard setup and customary capabilities, lack of an history of fires (including arson) in and around the Lighthouse Marine facility and any other topics covered in any pretrial deposition taken from such representative.

- I. Galveston Fire Department
823 26th Street
Galveston, Texas 77553
409/797-3850

A representative of this entity is expected to offer testimony under Federal Rule 702, 703 and/or 705 on topics including fire response, post-incident investigation on cause and origin and perpetrators, shipyard setup and customary capabilities, lack of any history of fires (including arson) in and around the Lighthouse Marine facility and any other topics covered in any pretrial deposition taken from such representative.

- J. Galveston County ESD 2 – Station 1
930 Noble Carl Drive
Port Bolivar, Texas 77650
Report previously produced as LM00040-LM00042

A representative of this entity is expected to offer testimony under Federal Rule 702, 703 and/or 705 on topics including fire response, post-incident investigation on cause and origin and perpetrators, shipyard setup and customary capabilities, lack of any history of fires (including arson) in and around the Lighthouse Marine facility and any other topics covered in any pretrial deposition taken from such representative.

- K. High Island Volunteer Fire Department
2033 7th Street
High Island, Texas 77623
409/286-5811

A representative of this entity is expected to offer testimony under Federal Rule of Evidence 702, 703 and/or 705 on topics including fire response, post-incident investigation on cause and origin and perpetrators, shipyard setup and customary capabilities, lack of any history of fires (including arson) in and around the Lighthouse Marine facility and any other topics covered in any pretrial deposition taken from such representative.

- L. Richard “Rick” Bonsey
Address unknown
409/978-0833

This individual is expected to offer testimony under Federal Rule of Evidence 702, 703 and 705 on topics including work, repairs and/or outfitting conducted on and/or recommended to be conducted on the S/V NINO, advices given to Jubilee Sailing, LLC with regarding to actual and/or anticipated or recommended work, repairs and/or outfitting, responses from Jubilee Sailing, LLC representatives to same and any other topics covered in any pretrial deposition taken for such individual.

- M. Sonnis Castro-Castillo
19th Street
Galveston, Texas 77573
832-348-0486 or 832-248-0487
And crew c/o Sonnis Castro-Castillo consisting of Timothy D. Salinovich, Ricardo Aleman Soto, Gilberto Contortero and Adolfo Vargas Carbajal.

This individual and/or members of his crew are expected to offer testimony under Federal Rule 702, 703 and/or 705 on topics including wood work, repairs and/or outfitting conducted on and/or recommended to be or not to be conducted on the hull of the S/V NINO, assessment of and opinions on the condition, suitability and seaworthiness of the hull of the S/V NINO prior to the fire incident and any other topics covered in any pretrial deposition taken of such individual(s).

- N. United States Coast Guard - Galveston
3000 Fort Point Rd.
Galveston, Texas 77550
409/766-4700
Knowledge of Lighthouse Marine, LLC facility, lack of reportable incidents or citations and lack of status of a facility subject to risk assessment plans pursuant to statutes, regulations, notices or other written guidelines related to same.
- O. Representatives of D & A Welding and Fabrication Co.
7610 FM 2004
Hitchcock, Texas 77563
409/316-4290

These representatives are expected to offer testimony under Federal Rule 702, 703 and/or 705 regarding the nature and extent of damage to the M/V MS MONICA as a result of grounding prior to the arson incident in suit, the nature and extent of repairs necessitated by the grounding, the effect of such damages to the structural integrity of this vessel and its effect on market value prior to the arson incident.

- P. Eddie Gilden or substitute
Aransas Marine Ways Inc.
138 Allen Boulevard
Aransas Pass, Texas 78336
361/758-7425

This individual is expected to offer testimony under Federal Rule of Evidence 702, 703 and/or 705 regarding the condition and general valuation of the S/V NINO at or around the time of purchase of this boat by Jubilee Sailing, LLC in mid-2021, recommendations for or against repairs and/or modifications to be and/or actually carried out on this boat at or around Aransas Marine Ways Inc. during the second half of 2021 and early 2022.

- Q. Tim Greeson – Naval Architect
Sealy Technical Services, PLLC
5555 Mieth Rd.
Sealy, Texas 77474
281/352-4638

This individual is expected to offer testimony under Federal Rule of Evidence 702, 703 and/or 705 regarding the condition and general valuation of the S/V NINO at or around the time of purchase of this boat by Jubilee Sailing, LLC in mid-2021, recommendations for or against repairs and/or modifications to be and /or actually carried out on this boat at or around Aransas Marine Ways Inc. during the second half of 2021 and early 2022.

- R. Lance Lage
Motores Y Partes Destoit Diesel Del Pacifico
Eje 3 Sur Baja California 200
06760 CDMX
Districto Federal – Mexico
55-5564-7095

This individual is expected to offer testimony under Federal Rule 702, 703 and/or 705 regarding expert consultation services provided to Jubilee Sailing, LLC in relation to powering and other aspects of the S/V NINO.

- S. Juan Morales
Address and phone pending
Consulted on wood work on S/V NINO while boat at Aransas Marine Ways Inc. – affiliation with Sonnis Castro-Castillo (See M. above)

- T. Marc Craven
Craven Shipbuilding
1001 Sue Dr. – Suite C2
Kemah, Texas 77565
713/924-7746

This individual is expected to offer testimony under Federal rule 702, 703 and/or 705 regarding expert consultation and other services provided to Jubilee Sailing, LLC in relation to repair or other disposition of the hull of the S/V NINO.

U. Daniel “Danny” Salinovich
Address and phone pending

This individual is expected to offer testimony under Federal rule 702, 703 and/or 705 regarding expert consultation and work provided to Jubilee Sailing, LLC in relation to repair or other disposition of the hull, electrical wiring, plumbing and other features/systems onboard the S/V NINO.

V. All other individuals and/or entities identified by Defendants during the course of this litigation whose knowledge might be considered as “expert” in any relevant areas of inquiry.

W. Without vouching for the credibility of individuals identified unless otherwise indicated, all retained and/or no-retained experts designated and/or identified by Plaintiffs and/or Intervenor during the course of this litigation.

Defendants, Lighthouse Marine, LLC and Peninsula Marine, LLC reserve the right to designate additional experts in this matter and/or to de-designate any experts previously designated at any time during the course of this litigation.

Respectfully submitted,

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP**

/s/ *Ronald L. White*

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**ATTORNEYS FOR DEFENDANT,
LIGHTHOUSE MARINE, LLC. and
PENINSULA MARINE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading has been served on all counsel of record, in accordance with the Federal Rules of Civil Procedure, via electronic service on this 24th day of July, 2024.

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/s/ **Ronald L. White**
Ronald L. White